

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MANISH RAJ GUPTA, aka MANNY  
GUPTA,

Defendant.

) INDICTMENT

) **3 : 20 CR 208**

) CASE NO. \_\_\_\_\_

) Title 18, United States Code,  
) Sections 1591(a) and (b)(1); Title  
) 21, United States Code, Sections  
) 841(a)(1) and (b)(7)

COUNT 1

**JUDGE CARR**

(Sex Trafficking by Force, Fraud, or Coercion, 18 U.S.C. §§ 1591(a) and (b)(1))

The Grand Jury charges:

1. From on or about August 9, 2016 to on or about September 24, 2016, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MANISH RAJ GUPTA, aka MANNY GUPTA, did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, and solicit by any means, in and affecting interstate commerce, a person, namely Victim #1 (an adult female whose identity is known to the Grand Jury), knowing and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion would be used to cause Victim #1 to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and (b)(1).

COUNT 2

(Illegally Dispensing a Controlled Substance, 21 U.S.C. §§ 841(a)(1) and (b)(7))

The Grand Jury further charges:

2. From on or about September 23, 2016 to on or about September 24, 2016, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MANISH RAJ GUPTA,

aka MANNY GUPTA, knowingly distributed and dispensed a controlled substance, and did so with intent to commit a crime of violence, as defined in section 16 of Title 18 (including rape), against an individual, to wit: Victim #1, without Victim #1's knowledge, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(7).

FORFEITURE SPECIFICATION

The Grand Jury further charges:

3. The allegations of Count 1 are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 1594(d). As a result of the foregoing offense, Defendant MANISH RAJ GUPTA, aka MANNY GUPTA, shall forfeit to the United States: (i) all property, real and personal, that was involved in, used - or intended to be used - to commit or to facilitate the commission of the offense, and all property traceable to such property; and, (ii) all property, real and personal, constituting - or derived from - any proceeds that the defendant obtained, directly or indirectly, as a result of the offense, and all property traceable to such property; including, but not limited to, Defendant's medical license and electronics seized from Defendant's medical offices, residence, and person.

4. The allegations of Count 2 are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853. As a result of the foregoing offense, Defendant MANISH RAJ GUPTA, aka MANNY GUPTA, shall forfeit to the United States any and all property constituting or derived from any proceeds he obtained directly or indirectly as a result of such violation; and, any and all of his property used or intended to be used in any manner or part to commit or to facilitate the commission of such violation; including,

but not limited to, Defendant's medical license and electronics seized from Defendant's medical offices, residence, and person.

A TRUE BILL.

Original document—Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.